

## The Honorable Lauren King

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE**

STATE OF WASHINGTON, et al.,

NO. 2:25-cv-00244-LK

**Plaintiffs,**

DECLARATION OF TODD R.  
BOWERS IN SUPPORT OF  
PLAINTIFFS' MOTION FOR  
CONTEMPT, SHORTENED TIME,  
AND ATTORNEYS' FEES

DONALD J. TRUMP, in his official capacity  
as President of the United States, et al.,

#### Defendants.

**NOTE ON MOTION CALENDAR:  
Friday March 14, 2025**

**ORAL ARGUMENT REQUESTED**

I, Todd R. Bowers, declare as follows:

1. I am over the age of 18, competent to testify as to the matters herein, and make this declaration based on my personal knowledge.

2. I am a Deputy Attorney General in the Washington State Attorney General's Office. I have served in this role since 2017 and have served as an attorney and supervisor in Attorney General's Office since October 1995. I supervise the work of the litigation team handling this matter.

3. The Washington State Attorney General's Office uses set hourly billing rates, updated periodically, for its attorneys and paralegals, based on the reasonable and customary fees charged in the area for professionals with similar years of experience in the relevant subject matter.

1       4. Assistant Attorney General William McGinty is an Assistant Attorney General in  
 2 the Complex Litigation Division and is one of the attorneys of record in this action. Mr. McGinty  
 3 graduated from the University of California, Berkeley, School of Law in 2009, and was admitted  
 4 to the Washington State Bar the same year. He joined the Washington State Attorney General's  
 5 Office in 2013. He regularly handles litigation in U.S. District Courts. The billing rate for  
 6 Mr. McGinty is \$517 per hour. This is a reasonable rate for an attorney with Mr. McGinty's  
 7 experience. Mr. McGinty spent 12.5 hours attempting to resolve the dispute giving rise to the  
 8 instant motion and performing research for the motion, preparing the motion, preparing  
 9 supporting declarations, and preparing supporting exhibits.

10      5. Assistant Attorney General Colleen Melody is the Chief of the Civil Rights  
 11 Division in the Washington State Attorney General's Office and is one of the attorneys of record  
 12 in this action. Ms. Melody graduated from the University of Washington Law School in 2009,  
 13 and was admitted to the Washington State Bar in 2010. She clerked for the Honorable Ronald  
 14 M. Gould of the U.S. Court of Appeals for the Ninth Circuit, then spent nearly five years with  
 15 the U.S. Department of Justice's Civil Rights Division in Washington, D.C. Since 2015, she has  
 16 served in the Civil Rights Division where she regularly handles litigation in U.S. District Courts  
 17 and U.S. Courts of Appeals. The billing rate for Ms. Melody is \$517 per hour. This is a  
 18 reasonable rate for an attorney with Ms. Melody's experience. Ms. Melody spent 8.25 hours  
 19 attempting to resolve the dispute giving rise to the instant motion and preparing the motion,  
 20 preparing supporting declarations, coordinating with declarants, and preparing supporting  
 21 exhibits.

22      6. Assistant Attorney General Andrew Hughes is a Section Chief of the Complex  
 23 Litigation Division and is one of the attorneys of record in this action. Mr. Hughes graduated  
 24 from Harvard Law School in 2011 and was admitted to the Illinois State Bar that same year, then  
 25 the Washington State Bar in 2015. He clerked for Chief Justice Dana Fabe of the Alaska Supreme  
 26 Court, then spent six years in private practice in Chicago and Seattle, before joining the Complex

1 Litigation Division in 2018. He regularly handles litigation in U.S. District Courts and U.S.  
 2 Courts of Appeals. The billing rate for Mr. Hughes is \$466 per hour. This is a reasonable rate  
 3 for an attorney with Mr. Hughes's experience. Mr. Hughes spent 6.5 hours preparing the motion  
 4 and supporting papers.

5       7. Paralegal Victoria Johnson is a supervising Paralegal 2 in the Complex Litigation  
 6 Division in the Washington State Attorney General's Office and is the primary professional staff  
 7 member assigned to this action. Ms. Johnson has worked in the division since May of 2021. The  
 8 billing rate for Ms. Johnson is \$158 per hour. This is a reasonable rate for a paralegal with  
 9 Ms. Johnson's experience. Ms. Johnson spent 10.5 hours preparing the motion and supporting  
 10 papers.

11       8. Paralegal Tally Locke is a Paralegal 1 in Complex Litigation Division in the  
 12 Washington State Attorney General's Office and is the secondary professional staff member  
 13 assigned to this action. Ms. Locke has worked in the Attorney General's Office since  
 14 October 2021. The billing rate for Ms. Locke is \$158 per hour. This is a reasonable rate for a  
 15 paralegal with Ms. Locke's experience. Ms. Locke spent 5.7 hours preparing the motion and  
 16 supporting papers.

17       9. Paralegal Alicia Stensland is a Paralegal 2 in Complex Litigation Division in the  
 18 Washington State Attorney General's Office and is the primary professional staff member  
 19 assigned to this action. Alicia has worked in the Washinton State Attorney General's Office since  
 20 September 2018 and with Complex Litigation since August 2021. The billing rate for Alicia is  
 21 \$158 per hour. This is a reasonable rate for a paralegal with Alicia's experience. Alicia spent 4.5  
 22 hours preparing the motion and supporting papers.

23       10. Paralegal Jamie Wuco is a Paralegal 2 in Complex Litigation Division in the  
 24 Washington State Attorney General's Office and is the secondary professional staff member  
 25 assigned to this action. Ms. Wuco has worked in the division since July 2024. The billing rate  
 26

for Ms. Wuco is \$158 per hour. This is a reasonable rate for a paralegal with Ms. Wuco's experience. Ms. Wuco spent 3.9 hours preparing the motion and supporting papers.

11. The total of the hourly rates above, multiplied by the hours worked, is \$17,643.55. None of this accounts for night, weekend, or overtime work, which much of the work to prepare this motion entailed. I will supplement this declaration when the reply brief in support of this motion is filed.

I declare under penalty of perjury under the laws of the State of Washington and the United States of America that the foregoing is true and correct.

DATED this 6th day of March 2025 at Seattle, Washington.

*TMS*

TODD R. BOWERS, WSBA #25274  
Deputy Attorney General